

92 Youngs Road Trenton, New Jersey 08619 (609) 890-8304 FAX (609) 890-0638

2283 '98 MAR -9 P1:42

March 4, 1998

Dockets Management Branch (HFA-305) FDA 12420 Parklawn Drive Rockville, MD 20857

Dear FDA,

I am glad you are considering regulating the reconditioners, refurbishers of medical equipment. This market is in need of full GMP compliance. My company manufactures products under FDA GMP and is inspected every two years. I think you would be doing the right thing in protecting the public if you would inspect the medical remarketer industry.

The medical service market is full of companies repairing equipment with used, bogus parts. And, these companies have no problem hiding the fact they use used parts. Of course, I'd be the first to tell you some hospital biomedical departments don't care about receiving used parts in their repairs. All they want is price, price, price. That's fine if the equipment was going to be used on them, but unfortunately it's the unknowing patients who are being diagnosed with this bogus equipment that might become the victims.

And, it's not only repairing equipment with used parts. How about selling used products as brand new or mislabeling equipment they're sending out to hospitals. Why repair equipment with new parts if no one is regulating them and they can get away with using used parts in repairs. There's so much profit in selling used parts and the public has no idea what is being used on them to fix their ailments. The government wants to regulate tobacco, they better also look at this market.

I have enclosed past correspondence to the FDA to highlight some, but far from all the abuses in this business. If you would like to discuss this further, or personally inspect some of the best of the worst junk sent to hospitals by remarketing companies, pleased contact me at your earliest convenience.

Sincerely.

gbr E. Ziedonis

President

97N-0477

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MAI MEDICAL ACCESSORIES, INCORPORATED

92 Youngs Road Trenton, New Jersey 08619 (609) 890-8304 FAX (609) 890-0638 April 10, 1996



Mr. John F. Stigi
Director
Div. of Small Manufacturers
Office of Health and Industry Programs
Food and Drug Administration
Rockville, MD 20857

Dear Mr. Stigi,

Thank you for your notice regarding the <u>Medical Device Industry</u>
<u>Initiatives</u>. It clearly looks as if these new changes will be very positive.

As I am not sure who I need to contact, I would ask you to forward the following information to the proper compliance officer.

Medical Accessories, Inc. has been registered and inspected by the FDA since 1976. I can find no proof of two of our competitions being registered anywhere. The problem with this is two fold. First, our costs are higher due to compliance which we wholeheartedly endorse. Second, they are using used parts in their repair service, one of them advertised that they sell new parts only for us to discover that half the parts were used and they mislabel their products. All very serious issues which could adversely impact hospital patients. I have proof on all of the above. Further, an inspection would reveal they use used parts because they would be unable to show you brand new replacement parts for ultrasonic transducers and tocotransducers.

The companies I am specifically naming are:

1.) Medical Cables, Inc. (MCI) 1340 Logan Ave. Costa Mesa, CA 92626

2.) SMC (is run by MCI's daughter) 800 336-5268 she doesn't advertise her address

As an example, I have enclosed a label error from MCI. The error on this label is that you cannot use a 111 or 112 ultrasonic transducer with a 115 fetal monitor. Each transducer has an entirely different connector and they cannot be interchanged between fetal monitors. In fact, a 111 transducer cannot be used with either a 112 or 115 fetal monitor. It has a circuit in it that the 112 and 115 don't. This is a very serious defect in labeling.

I am also glad to hear the FDA may begin regulating the used equipment market. This area is filled with so many cheats, unethical

MAI MEDICAL ACCESSORIES, INCORPORATED

92 Youngs Road Trenton, New Jersey 08619 1 (609) 890-8304 FAX (609) 890-0638

Mr. John F. Stigi April 10, 1996 Page 2

dealers that without question, hospitals and patients are being lied to and cheated. We encourage your review of this as we have been in compliance since 1976 and we also endorse the FDA's effort to protect the patient, hospital and endusers.

Sincerely,

Gor E. Ziedonis

President

MEDICAL ACCESSORIES INCORPORATED

92 YOUNGS ROAD TRENTON, NJ 08619

IGOR ZIEDONIS
PRESIDENT
(609) 890-8304
FAX: (609) 890-0638





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.Alcon / CooperVision Models 10,000 & 9001 Chiron, Storz

Repair.....\$ 495.00 Refurbish \$1,595.00 Repair/ Exchange \$1,895.00 . Refurbished Handpieces Available... \$2,295.00

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Avit Handpieces

New / Exchange..... \$ 750.00 Repair..... \$ 495,00



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READER SERVICE NO. 38

SEPTEMBER/OCTOBER 1995

Lee enclosed, I'd make sure They prove They use only brand new parts in This. She enclosed, They previously soll " new" transducers. That had used parts Them i

THE BEST SOURCE FOR CABLES IS MCI

Specializing in Repair for COROMETRICS and HEWLETT- PACKARD Fetal Monitoring Accessories

New Ultrasound Transducers \$315.00

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REPAIR / CALIBRATION

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Model 111,112,115 1 165.00

COROMETRICS ULTRASOUND

Model 111,112,115 \$,195.00

HEWLETT-PACKARD ULTRASOUND

Model 8030,8040 \$ \$5.00

HEWLETT-PACKARD TOCO TRANSDUCER

Model 8030,8040 \$205.00

HEWLETT-PACKARD "QUARTZ" PRESSURE TRANSDUCER

Model 1290A \$275.00

We bought one Through a friend and found it to contain 50%. wied parts. I still hove This

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READER SERVICE INC. 25

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READER SERVICE NO. 24

SEPTEMBER/OCTOBER 1995

27

800 243 3952



92 Youngs Road • Trenton, NJ 08619 • (609) 890-8304

April 10, 1990

-7 EXT 545

Mr. Pat Dwyer
Marketing Manager
Corometrics Medical Systems, Inc.
61 Barnes Park Rd. N.
Wallingford, CT 06492

SENT VIA FAX TRANSMISSION

GOPY

Dear Pat,

It was a pleasure speaking with you earlier. I am faxing you copies of the invoices from our third party source and literature from Medical Cables, Inc. regarding their new ultrasonic transducers compatible with your fetal monitors.

From our quick initial review of their <u>new</u> 115 compatible ultrasonic transducer here's some of what we found:

- 1.) An original (looks used) Corometrics transducer cover
- 2.) An original Corometrics connector
- 3.) An original Corometrics cable
- 4.) An original Corometrics internal metal plate
- 5.) PC board manufactured by MCI
- 6.) Poor workmanship inside housing; excess flux, solder, etc.

Unless MCI is buying these parts from you, they're using old used parts and selling them as new. This is fraud.

If you would like to see this transducer first hand, please let me know and I would be happy to meet with you. I appreciate your interest in this matter and don't hesitate to call me if you need more information.

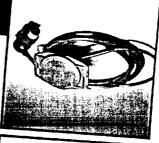
Best Regards,

Igor E. Ziedonis

Vice President, Marketing

IEZ:nd

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2555

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3-50-50

PAGE:

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SHIPPED TO

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1	.1.	1	·CORO US #115 ·			2 5% CC
				1.	FTG. TOTAL	13.50 278.50

FOR RESALE



92 Youngs Road Trenton, New Jersey 08619 (609) 890-8304 FAX (609) 890-0638

December 19, 1996

SENT VIA FAX TRANSMISSION AND REGULAR MAIL

Ms. Jean Kelahan Investigator U.S. FDA 120 N. Center Drive North Brunswick, NJ 08902

Dear Ms. Kelahan,

It was a pleasure speaking with you recently. I hope your last visit to Medical Accessories, Inc. was successful.

300

I just wanted to pass along to you the most recent advertisement sent to hospitals nationally by Epic Medical (Exhbit A). The disturbing issue here is the continuation of false and misleading information. They state again; "All of our reparis utilize new parts only, and never use scavenged parts as part of the repair." Why then is it that just this past December 17, 1996 we mailed them back transducers we repaired for them. Repairs that did include brand new parts. Enclosed (Exhibit B-1 and B-2) you'll find their Purchase Order to MAI and our invoice back to them for repairing fetal monitoring transducers. There were also two more P.O.s sent that day.

If they have as they claim, new parts for every repair, why are they sending repairs to us? The disturbing issue here is they are getting away with false advertising to unknowing hospitals. There ad's make it seem Epic is doing exactly what MAI does, repairing every transducer with new parts. But, Epic is lying. I have transducers they've repaired which were sent to us direct from unhappy hospitals. We've torn them apart and have found used, scavenged parts. The same partsthey're advertising they don't use.

I hope this information is of interest to you. The third party medical repair business is in dire need of being cleaned up. Please call me if I can be of any further assistance.

Sincerely,

Idan E. Ziedonis

President

cc: Janis G. Ziedonis, CEO

EDICAL ACCESSORIES, INC.

92 YOUNGS ROAD TRENTON, NJ 08619 TEL (609) 890-8304 FAX (609) 890-0638

HBITB-Z

EPIC MEDICAL EQUIP SERVICES 4643 WESTGROVE DALLAS, TX 75248 ACCOUNTS PAYABLE

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			WORK ORDER NO.	B.O.

- EPIC MEDICAL EQUIP SERVICES
- 4643 WESTGROVE
- RECEIVING
- DALLAS, TX 75248
- P.O.# 1100052

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T115TOCOR	REPAIRED COROMETRICS 115 TOCOTRANSDUCER 2260AAX, REPLACED CABLE, HOUSING, POTS REWIRED & RECALIBRATED TOCO				
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THANK YOU	FOR YOUR PATRONAGE	CUSTOMER COPY		57627	THIS AMOUN

Epic Medical Equipment Services, Inc. 4643 WESTGROVE DRIVE, DALLAS, TEXAS 75248 (800) 327-3742 (972) 713-0444 FAX (972) 713-0465 mail epic@computek.net

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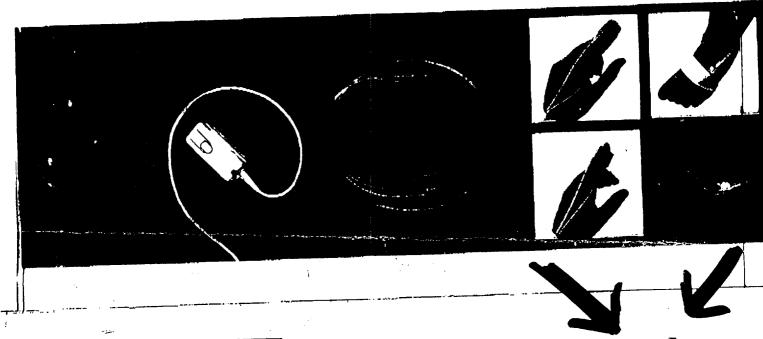
ATTN: BIOMEDICAL/CLINICAL ENGINEERING DEPARTMENT

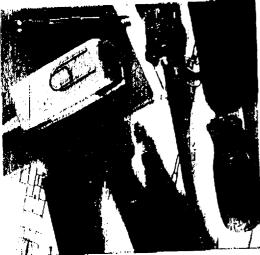
Mercer Medical Center

PO BOX 1658

Trenton NJ 08607

Montalallalladadadhilalalalalalalalalalalalalalal





Since that time we have repaired thousands. EPIC developed the technology to repair the Pulse Oximeter Sensor in 1989 and was the manufacturers said could not be repaired. We have added other new services to our INNOVATION AND CREATIVITY enabling the hospital to gain significant first to repair the sensors that the Services, Inc.

All of our repairs utilize new parts only, and Printed Circuit Boards used in Oximeters and IV Pumps never use scavenged parts as part of the

Another QUARTY service from

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DEC-11-1330 17:17 FROM

Fetal Monitoring Transducers

repair line, including:

Oximeters

Epic Medical Equipment



92 Youngs Road Trenton, New Jersey 08619 (609) 890-8304 FAX (609) 890-0638

August 2, 1994



Director of Registration Food and Drug Administration Center for Devices and Radiological Health Devices Registration and Listing Branch (HFZ-342R) 1390 Pickard Drive Rockville, MD 20850-4332

Dear Director,

I know that funds have been cut and the FDA is short on investigators, but my concern is that the FDA sends two investigators to a small company like ours, under 20 people, for three days while other companies do not even register with the FDA and therefore avoid inspections and compliance with all FDA regulations. We have been registered with the FDA since 1976.

Most of these companies you do not inspect repair medical equipment with used parts (we have proof), mislabel products, switch labels and undercut honest companies that have been working and complying with the FDA and Good Manufacturing Practices since 1976.

As we have not found any evidence these companies are registered, if we may suggest it, the FDA might want to inform these companies that they must be registered with you. The companies we are specifically aware of and could not find any FDA registration are:

- 1.) Medical Cables, Inc. 1340 Logan Ave Costa Mesa, CA 92626 (800)828-1599
- 3.) SMC (Run by daughter of 1.) no address (See enclosed Advertisement) (800) 336-5268
- 5.) Tri-Star 1104 Summit Avnue, Suite 101 Plano, TX 75074 (800) 578-3428
- 2.) Medelco 600 Industrial Way Boynton Beach, FL 33426 (407) 547-0968
 - 4.) Epic Medical Equipment 17618 Davenport, Suite #2 Dallas, TX 75252 (214) 713-0444
 - 6.) Bio-Medical Equipment 2122 Palatka Road Louisville, KY 40214 (800) 626-4515



92 Youngs Road
Trenton, New Jersey 08619
(609) 890-8304
FAX (609) 890-0638
Food and Drug Adminstration
August 1, 1994
Page 2

As I understand it, the function of government and its agencies is to protect the public and keep the marketplace fair and honest to all participants. If you are not in fact inspecting the companies I've listed, these companies not only have an unfair cost and regulatory advantage, but might be putting the public at risk who use their products and services.

The entire third party medical service industry needs to be investigated the same way you review Medical Accessories, Inc. operations. There are many companies unfairly and fraudulently repairing and selling equipment that borders on fraud. An example; advertising and selling used equipment as new.

I look forward to hearing from you regarding this matter. Thanking you in advance.

Sincerely,

Igor E. Ziedonis

President



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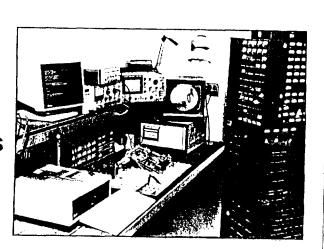
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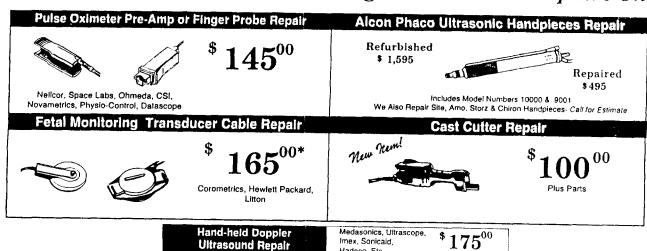
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READER SERVICE NO. 7

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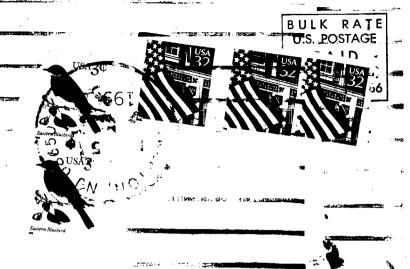
VOLUME DISCOUNTS AVAILABLE!! *PRICE INCLUDES ALL PARTS & LABOR (IF REPAIRABLE)
6 Month Warranty on Cables 3 Month Warranty On Doppler U.S. 30 Day Warranty On Phaco Ultrasonic Repairs
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Reader Service No. 8



92 Youngs Road Trenton, NJ 08619





Dockets Management Branch (HFA-305) FDA P 12420 Parklawn Drive Room 1-23 Rockville,MD 20857